

Ex 30 - Excerpts of the Deposition of Christopher Zimmerman taken 8/3/18 in
MDL 2804

Plaintiffs' Opposition to Defendants' Motion for Summary Judgment on Proximate
Causation Grounds

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF OHIO
3 EASTERN DIVISION

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5 IN RE: NATIONAL : MDL NO. 2804
6 PRESCRIPTION OPIATE :
7 LITIGATION :

7 : CASE NO.
8 THIS DOCUMENT : 1:17-MD-2804
9 RELATES TO ALL CASES:

 : Hon. Dan A.
 : Polster

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 Friday, August 3, 2018

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12 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
13 CONFIDENTIALITY REVIEW

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14 Videotaped deposition of
15 CHRISTOPHER ZIMMERMAN, taken pursuant to
16 notice, was held at the law offices of
17 Reed Smith, LLP, Three Logan Square, 1717
18 Arch Street, Suite 3100, Philadelphia,
19 Pennsylvania 19103, beginning at 9:00
20 a.m., on the above date, before Amanda
21 Dee Maslynsky-Miller, a Certified
22 Realtime Reporter.

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23 GOLKOW LITIGATION SERVICES
24 877.370.3377 ph| 917.591.5672 fax
 deps@golkow.com

1 Outside the scope.

2 THE WITNESS: It calls for a
3 conclusion. I don't know that.

4 BY MR. PIFKO:

5 Q. You don't know either way?

6 A. I don't know --

7 Q. If AmerisourceBergen does
8 not maintain effective controls to
9 prevent diversion of Schedule II
10 substances, they can be diverted,
11 correct?

12 MR. NICHOLAS: Object to the
13 form. Outside the scope.

14 THE WITNESS: Again, if we
15 don't adhere to our effective
16 controls to prevent diversion,
17 yes, diversion could occur.

18 BY MR. PIFKO:

19 Q. Let's discuss some of the
20 company's policies and procedures with
21 respect to diversion.

22 Before we do that, do you
23 agree that the laws and regulations with
24 respect to preventing diversion remain --